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Attorneys for Third Parties in Support of
Application to Seal Confidential Information

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION (SANTA ANA)

JULIANA GRIFFO,

Plaintiff,

v.

OCULUS VR, INC. and PALMER LUCKEY,

Defendants.

Case no. 8:15-cv-01288-DOC (JCGx)

Hon. David O. Carter

**DECLARATION OF GORDON C.
ATKINSON IN SUPPORT OF
APPLICATION TO SEAL CONFIDENTIAL
INFORMATION**

Complaint Filed: 7/31/15

I, Gordon C. Atkinson, declare:

1. I am an individual residing in the State of California and not a party to, nor an attorney to any party to, the above action. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify thereto under oath.

2. I am the attorney for a corporation and certain of its founders, none of whom is a party to this action.

3. I was informed on Friday, August 10, 2018, that one or more of the defendants in this litigation intended to file documents with this Court that would have made the terms of one or more agreements that my clients had with one or more of the defendants public. My clients

1 immediately became very concerned with this, as the disclosure of those terms could have very
2 damaging implications for them, both personally and professionally.

3 4. A misunderstanding of the documents (which would be likely given their contents)
4 could falsely communicate to persons reviewing the files that my clients have an extremely high
5 net worth. My clients believe that this could damage them (and their families) in a number of ways
6 from nuisance lawsuits, to kidnappings, threats of extortion, or other demands, and it could do
7 serious damage to their personal and corporate brands. Responding to and dealing with the
8 ramifications of this information becoming public would also require substantial funds, including
9 hiring attorneys and/or others to help them address security concerns, privacy concerns, and other
10 legal and practical concerns that could arise.

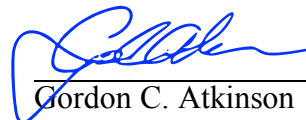
11 5. Also, my clients consider any disclosure of information concerning their assets,
12 liabilities, or net worth – even an entirely accurate account – to be an invasion of their privacy.

13 6. In particular, any reference to one of the principals of my client owning any
14 percentage of Oculus would be highly sensitive. In addition, there is a specific reference at page
15 269 of the Luckey deposition where reference is made to my client (by name) that also refers to
16 him as both (i) a person who had a prior conversation with the plaintiff, and (ii) a person with an
17 “interest” in Oculus. Given that it is public already that my client is the one that had a
18 conversation with plaintiff, this particular entry allows someone to determine with relative ease
19 that my client also had an interest in Oculus, even without the use of his name.

20 7. For these reasons, my clients request that the documents that contain this
21 confidential information be filed under seal.

22 I declare under penalty of perjury under the laws of California that the foregoing is true and
23 correct and that this declaration was executed on October 2, 2018, within the State of California.

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25 Dated: October 2, 2018


Gordon C. Atkinson

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